

From: [Jay Rao](#)
To: [WEISS, MICHAEL](#)
Subject: RE: Platform B and C Inspection Report
Date: Friday, December 13, 2019 10:05:15 AM
Attachments: [Plt. C-Sanitary Effluents.JPG](#)
[AIS-RedFox Units Platform C & Hillhouse.docx](#)
[Turbidity Meter Calibration - B.pdf](#)
[C RF clnout t7-17-18.JPG](#)
[C RF clnout 3-13-17.JPG](#)
[C RF clnout 3--24-16.JPG](#)

Hi Michael,

Good Morning: With reference to your inspections at Platforms C and B on 8/20/19 and 8/21/19 respectively, please see below for DCOR's response to your areas of concern:

Areas of Concern:

1. Rust and Corrosion throughout the facilities:

DCOR's Response: To mitigate this problem , DCOR follows the following API-recommended standards

- API 510,570 and 653 for inspections of vessels, process piping and tanks
- API RP 2 SIM for structural inspections
- NACE SP 169/176 for Cathodic protection
- While descaling/cleaning the structure , vessels, tanks or piping by needle gun, grit blasting or by other means, DCOR's policy is to collect all the generated debris on a tarp or a similar material so that no debris goes into the ocean

2. The discharge from the MSD at Platform C was cloudy:

DCOR's response:

- A day prior to the inspection, the platform had 10 contract workers on board, besides 5 regular operators. Unusually the high number of traffic may have overloaded the MSD unit that resulted in cloudy discharge. The unit has since been cleaned by American Integrated Services on 12/10/19(letter attached). Discharge is clear now. Please see the attached image. With regard to the calibration, we don't do any calibration, only visual inspection. During the annual cleanout , visual inspection is done by the crew. If any deficiency is observed, it would be addressed immediately. Also, attached you would find snap shots of last 3 year's cleanout schedule.

3. Platform B's Turbidity Calibration:

DCOR's Response:

- Please see attached copy of the spreadsheet.

If you have any question or need anything further, please let me know.

Regards,

Sincerely,

Jay Rao
DCOR,LLC

From: WEISS, MICHAEL <weiss.michael@epa.gov>
Sent: Friday, October 25, 2019 4:02 PM
To: Jay Rao <JRao@dcorllc.com>
Cc: james.salmons@bsee.gov; Ronald Worrell <RWorrell@dcorllc.com>
Subject: Platform B and C Inspection Report

Jay,

Please find attached EPA's report for our August 2019 Clean Water Act compliance inspection of Platform B and Platform C. Feel free to contact me with any questions.

Best Regards,
Mike

Michael Weiss
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